

Process Improvement Proposal for Operable Unit 11, West Spray Field (OU 11)

Current Condition

1. OU 11 is classified per the IAG as a RCRA lead OU. The implications of this designation are that the Colorado Department of Health (CDH) is the lead regulatory agency and the process by which this OU is investigated has been broken into two separate phases of investigation. The initial phase investigates the nature and extent of contamination within the source and soils. This has been interpreted as the actual field. The next phase investigates the nature and extent of contamination from OU 11, which has been interpreted as defining any contamination that may have migrated outside the boundaries of the West Spray Field. These phases are defined Attachment 2, Section I.B.11.b of the IAG.

2. RCRA Subpart G Part 265.111 (b) requires closure performance standard that controls, minimizes, or eliminates (contamination) to the extent necessary to protect human health and the environment. This corresponds to equivalent guidance from the Colorado Hazardous Waste Act (CHWA). Compliance to this requirement is demonstrated by controls that can be established to mitigate any identified risk. The risk assessment process is divided into two separate assessments since the data necessary to assess risk from all potential pathways (i.e. ground water, air, etc.) is provided by two separate field investigations. The Phase I risk assessment evaluates risk from the upward pathways only, i.e. exposure from air transport or direct contact. Phase II looks at exposure from contaminated ground water or surface water.

3. Data from the Phase I investigation and risk assessment is used to support development of an Interim Measure/ Interim Remedial Action (IM/IRA) decision document that proposes an action designed to mitigate risk from the source and soils to an acceptable level determined by DOE

and the agencies. The data is further evaluated to determine the need to complete subsequent field sampling activities.

4. The current Field Sampling Plan for OU 11 proposes an extensive sampling grid for test pits and surface soils for Phase I of the investigation and for Phase II specifics to be determined by the Phase I investigation. The Work Plan did not incorporate the results of a rigorous statistical review.

Proposal

In light of the facts outlined above, DOE proposes to enter into negotiations with the agencies to streamline the IAG process for OU 11 by the following actions:

A. Integrate the Phases I and II Field Efforts

Justification

Current and historical data from surficial soils, subsurface soils, and groundwater indicate that any potential contaminants from past practices are at or below background levels. Indications are that any risks from the existing sources at OU 11 do not require implementation of interim measures.

Integration of the phased field efforts would allow for final disposition of this OU without the need for IM/IRA and Phase II processes. The revised scope of the integrated field investigation would support an accelerated final action for OU 11. This would, in effect, allow for earlier implementation of any actions identified as necessary to mitigate risks from OU 11.

Advantages

The advantages of integrating the field efforts are a cost savings to taxpayers with no impact to the ability to protect human health and the

environment, as well as a schedule reduction. Specifically, the savings are estimated to be \$150,000 for elimination of the Phase II Work Plan, \$80,000 for elimination of Phase II mobilization efforts associated with a second investigation, and \$250,000 for elimination of the Phase II RFI/RI report. Schedule reduction will amount to up to two years.

B. Revise Phase I Field Sampling Plan

Justification

Evaluation of historical analytical data indicates a potential for a reduction of analytical samples necessary to support OU 11 closure. This revised FSP will be submitted to the agencies for approval.

Advantages

Any reduction in scope would result in significant cost savings as well as accelerated schedule. The reduction would be one which does not affect the ability to assess risk to human health and the environment.

C. Eliminate Interim Measures/Interim Remedial Action (IM/IRA) Decision Document

Justification

An integrated field effort would eliminate the need for interim measures by providing the data necessary to support actions associated with the final disposition of OU 11. Therefore, no IM/IRA Decision Document will be necessary.

Advantages

The IM/IRA decision document could be eliminated for a cost savings of \$300,000 and a schedule reduction of 12 to 18 months.